

Blanchard, Laughland & Tacik, Inc., Surveyors and Engineers, Frederick, Maryland, and for reasons states the following:

1. For the reasons stated in the Plaintiff's verified Complaint and accompanying Memorandum Of Law In Support Of Motion For Summary Judgment and the Affidavits attached hereto and incorporated herewith the Plaintiff's is entitled to Judgment as a matter of law quieting title to the aforesaid mentioned property.

2. Further, the Plaintiff incorporates herein by reference the allegations of facts contained in the Complaint and Order of Publication previously filed.

3. There is no genuine dispute as to any material fact that the Plaintiff has good and marketable fee simple title to the subject property or in the alternative there is no dispute of material fact that the Plaintiff has been in actual peaceable possession of the subject property and by reason by her adverse possession for the statutory period which possession has been open, notorious, visible, exclusive, hostile and continuous.

WHEREFORE, Plaintiff requests the following relief:

A. That the Court pass an Order directing that a copy of this Motion be served on the defendants in conjunction with the Complaint.

B. That the Court pass an Order quieting title and declaring that the Plaintiff, Daisy Dorsey has a good and